

**Proposals
Concerning Specifying Some Provisions
Of ECE Regulation No. 29 with Respect to Vans**

Transmitted by the representative of the Russian Federation

The experience of the Russian Federation with the ECE Regulation No. 29 indicates a necessity of specifying procedure of application of those Regulations with respect to vans.

The scope of the ECE Regulation No. 29 covers all types of commercial vehicles intended for carriage of goods (p. 1 of the Regulation No. 29). We do not dispute with this statement, but to our opinion, the test procedures stipulated in the present Regulations can be specified with respect to vans.

As a rule, vans for carriage of goods are assembled on the similar platform as the vehicles of M1 and M2 categories intended for transportation of passengers. Therefore the manufacturer may already possess the type approvals issued with respect to the provisions related to the passenger vehicles, according to which the conclusion on compliance with the ECE Regulation No. 29 can be made.

In particular the provisions concerning tests B and C should be specified.

Concerning Test ? (Roof strength): The necessity of performing of the test B on N1 category vehicles assembled on the same platform of M1 category vehicles equipped with bonnet type body should be discussed. The similar provisions for the roof of the vehicle are set in the ECE Regulation No. 52 (p. 5.4). Therefore the type approval of a vehicle with respect to the ECE Regulation No. 52 exists (if the compliance with the p. 5.4 had been verified) might be taken into account.

Concerning Test ? (Rear-wall strength): the load specified by the ECE Regulation No. 29 for the test C is relatively low for vans, if the case of front impact is considered and luggage is not well fixed. It is proposed to apply a static load of 2500 kgf per one ton of permissible payload for test C for vans. Besides that, since the provisions of the ECE Regulation No. 17-07 (p. 5.15 and Annex 9) are significantly severe, if the type approval of a vehicle with respect to the ECE Regulation No. 17-07 exists, the vehicle may be considered as conformed to the requirements of the Annex 3, p. 6 of the ECE Regulation No. 29.

C o n c l u s i o n

The Russian Federation makes a proposal of inclusion into the GRSP working plan the activity concerning specifying the provisions of the ECE Regulation No. 29 with respect to vans and ready to participate in such activity.
